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REPLY TO MONTCLAIR OFFICE

LETTER-MOTION, ON CONSENT,
TO CONTINUE SENTENCING DATE

February 10, 2020

Via ECF
Hon. Andrew L. Carter, Jr., U.S.D.J.
Thurgood Marshall Courthouse
40 Foley Square
New York, N.Y. 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 2-13-20

Re: United States v. Taylor, et al. (Defendant Wakiem Johnson)
18-cr-00586-ALC

Dear Judge Carter:

This letter-motion is respectfully submitted on behalf of Wakiem Johnson, with the consent of the United States, to continue the sentencing date, now scheduled for February 21, 2020, by 30 days. The parties have conferred and, if the Court allows this motion, will be available at a time convenient to Your Honor on the following dates: March 26 in the morning, all day March 27.

The reason for this request is defense counsel are engaged in further investigation of issues relevant to sentencing and require additional time, in part due to the schedule of service providers assisting in this process. As noted, the Government consents to this application. The defense consents to any exclusion of time pursuant to the Speedy Trial Act.

Your Honor's time and attention to this matter is appreciated.

Respectfully submitted

/s/ David A. Ruhnke

David A. Ruhnke, Ruhnke & Barrett

/s/ Diane Ferrone

Diane Ferrone, Law Offices of Diane Ferrone

2-13-20

Application granted. Sentencing
adjourned to 3-30-20 at
3 p.m.
S. [Signature] 7 C [Signature]